

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS, et al.,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff /
Intervening Interpleader Counter-
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, and BW
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Interpleader Defendants / Interpleader
Counter-Plaintiffs.

**BRIAN WATSON’S MOTION TO REMOVE
“ATTORNEYS’ EYES ONLY” DESIGNATIONS**

Defendant Brian Watson (“Watson”), by and through counsel, hereby moves for an order removing the “Highly Confidential—Outside Attorneys’ Eyes Only” designation on one document produced by Non-Party IPI Partners LLC (“IPI”) and Bates-stamped IPI_EDVA_0038930 to IPI_EDVA_0038939, which IPI designated as “Highly Confidential—Attorneys’ Eyes Only” pursuant to the Protective Order entered by the Court, ECF 55. In support of its motion, Watson

incorporates by reference herein all of the arguments in, and exhibits attached to, its Memorandum in Support. The document for which Watson seeks removal of the “Highly Confidential—Outside Attorneys’ Eyes Only” designation is attached as Exhibit C to the Declaration of Jeffrey R. Hamlin in support of this motion, and Watson is seeking leave to file under seal both the document and the Memorandum in Support.

As detailed in the accompanying Meet-and-Confer Statement, the parties have met and conferred in an effort to resolve this discovery dispute and have been unable to reach a resolution. Watson therefore seeks an order of this Court removing the “Highly Confidential—Outside Attorneys’ Eyes Only” designation on the document specified in this Motion.

In support of this Motion, Watson submits the accompanying Memorandum in Support, the Declaration of Jeffrey R. Hamlin in Support of the Motion, and accompanying exhibit. Watson also submits a Meet-and-Confer Statement and a Proposed Order granting this Motion.

WHEREFORE, Mr. Watson respectfully requests that the Court grant his Motion to Remove the “Attorneys’ Eyes Only” Designation.

Dated: August 12, 2022

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VA Bar No. 46932)

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